

**UNITED STATES DISTRICT COURT
FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

BONNIE ABRAHAM,)	
)	
Plaintiff)	
)	
v.)	Case No.: 3:13-cv-00843-JMM
)	
OMNI CREDIT SERVICES,)	
)	
Defendant)	

MOTION FOR DEFAULT JUDGMENT

Plaintiff, BONNIE ABRAHAM (hereinafter “Plaintiff”), by and through her counsel, Kimmel & Silverman, P.C., hereby moves this Honorable Court for an entry of Default Judgment against Defendant, Omni Credit Services, in the amount of \$2,714.00 inclusive of statutory damages and reasonable attorneys’ fees and costs.

WHEREFORE, for the reasons set forth in Plaintiff’s Memorandum in Support of this Motion, Plaintiff respectfully requests that this Honorable Court enter a default judgment in favor of Plaintiff and against Defendant in the amount of \$2,714.00.

RESPECTFULLY SUBMITTED,

Dated: 07/02/2013

/s/ Craig Thor Kimmel
Craig Thor Kimmel

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